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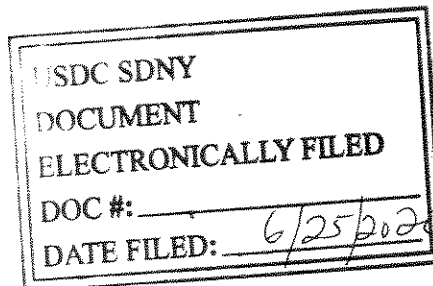
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BY ECF

Honorable Denise L. Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



June 19, 2020

Re: *United States v. Zaquan McCutchen*  
Dkt. No.: 19-CR-275

MEMO ENDORSED

Dear Judge Cote:

I am CJA counsel to Defendant Zaquan McCutchen in the above-referenced matter. I write to respectfully request that the Court modify Mr. McCutchen's conditions of release to permit him to travel to the Northern District of New York on either Friday June 26, 2020 or Friday, July 3, 2020.

Mr. McCutchen is seeking permission to visit with his father, whom he has not seen in more than five years. Mr. McCutchen's father resides at 3022 Albany Street, Schenectady, NY 12304, and Mr. McCutchen would like to travel to Schenectady for the day to visit with him. Mr. McCutchen intends to take Greyhound, or similar bus service, from New York City to Schenectady and return by bus the same day. In order to facilitate the hours-long bus ride in each direction, Mr. McCutchen is also seeking to have his curfew extended to 10:00 p.m.

By way of background, Mr. McCutchen made his initial appearance on March 19, 2019 before the Honorable James L. Cott. Judge Cott ordered Mr. McCutchen's pretrial release on a \$250,000 personal recognizance bond, to be signed by six financially responsible people, home detention with electronic monitoring and travel restricted to the Southern and Eastern Districts of New York. On December 30, 2019, Your Honor modified Mr. McCutchen's condition of release from home detention with electronic monitoring to a curfew enforced by location monitoring, with the curfew hours to be set at the discretion of Pretrial Services. Mr. McCutchen has, at all times, remained compliant with all of the conditions of his release.

I have spoken with Pretrial Services, by officer Jonathan Lettieri, and they have no objection to this request. The government defers to Pretrial's position.


Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone  
Edward V. Sapone

cc: A.U.S.A. Frank Balsamello  
A.U.S.A. Matthew Hellman  
P.T.S.O. Jonathan Lettieri

Denied.  
So Ordered: June 25, 2020

  
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DENISE COTE  
United States District Judge